

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION**

KAREN K. JONES,

Plaintiff,

v.

TRUSTEES OF ISOTHERMAL  
COMMUNITY COLLEGE, WALTER  
DALTON, KIMBERLY GOLD, and  
STEPHEN MATHENY,

Defendants.

C.A. No.: 1:18-CV-00367-MR-WCM

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO  
TERMINATE COUNSEL AND PROCEED *PRO SE***

COME NOW Defendants Trustees of Isothermal Community College, Walter Dalton, Kimberly Gold, and Stephen Matheny (collectively the "Defendants"), by and through their undersigned legal counsel, and submit this Response to Plaintiff's Motion to Terminate Counsel and Proceed *Pro Se* ("Motion").

Plaintiff filed her Motion to Terminate Counsel and Proceed *Pro Se* on May 26, 2020. [Doc. 28]. For the same reasons described in Defendants' Response to Plaintiff's Termination of Attorneys, Defendants now respond in opposition to the instant Motion. [Doc. 26; Doc. 31].

WHEREFORE, Defendants respectfully request the Court grant its Motion for Enforcement of Settlement Agreement and Sanctions Against Plaintiff and find that that this Motion is moot and issue such other and further relief that in the Court's judgment is necessary and proper in these circumstances.

Dated this the 9th day of June, 2020.

s/Matthew J. Gilley  
Matthew J. Gilley  
N.C. State Bar 31943  
mgilley@fordharrison.com  
Brian N. McCracken  
N.C. State Bar 54522  
bmccracken@fordharrison.com  
FORD & HARRISON LLP  
100 Dunbar Street, Suite 300  
Spartanburg, South Carolina 29306  
Telephone: (864) 699-1100  
Facsimile: (864) 699-1101

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing **DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO TERMINATE COUNSEL AND PROCEED *PRO SE*** was electronically filed with the Clerk of Court using the Court's CM/ECF system, which will serve notice on Counsel for Plaintiff identified below.

Michael P. Thomas, Esq.  
Molly Simpson Gross, Esq.  
Patrick, Harper & Dixon L.L.P.  
Post Office Box 218  
Hickory, NC 28603  
Attorneys for Plaintiff

This the 9th day of June, 2020.

s/ Matthew J. Gilley\_\_\_\_\_